

CONSIDERATIONS FOR DEVELOPING A SECOND GSP IN THE COSUMNES SUBBASIN

21 MARCH 2018
COSUMNES SUBBASIN WORKING GROUP / TAC MEETING



OUTLINE

- Intrabasin Coordination – Requirements and Opportunities
- Considerations for Potential Scoping of a “Second GSP”



COORDINATION IN SGMA

- A *statutory requirement* of GSP development
- Multi-faceted, involving various entities and levels of involvement:
 - **Intrabasin Coordination** – Between GSAs within a Basin
 - **Interbasin Coordination** – Between GSAs across Basin lines
 - **Stakeholder Engagement** – Between GSAs and local stakeholders / beneficial users
- Part of DWR’s evaluation criteria for an “Approved” GSP⁽¹⁾

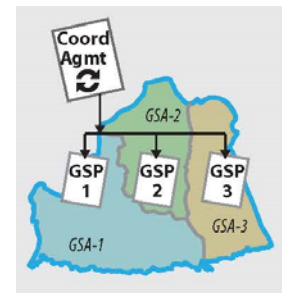


(1) GSP Regulations §355.2(e)

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INTRABASIN COORDINATION REQUIREMENTS

- One GSP submittal will be accepted per Basin
- Coordination agreements are required if more than one GSA within a basin intends to submit a GSP
- Coordination agreements must describe “a process for submitting all Plans, Plan amendments, supporting information, all monitoring data and other pertinent information, along with annual reports and periodic evaluations” ⁽¹⁾

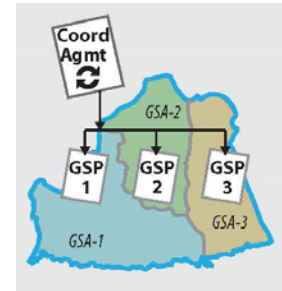


(1) GSP Regulations §357.4
Figure source: DWR, 2016. GSP Emergency Regulations Guide.

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INTRABASIN COORDINATION REQ.'S (2)

- Coordination agreements must describe...:⁽¹⁾
 - A point of contact on behalf of the Basin (i.e. “Plan Manager”)
 - The responsibilities of each GSA for meeting the terms of the agreement
 - Procedures for exchange of information between GSAs
 - Procedures for resolving conflicts between GSAs
 - **How the GSPs, implemented together, satisfy the requirements of SGMA**



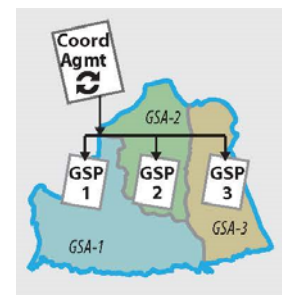
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(1) GSP Regulations §357.4
Figure source: DWR, 2016. GSP Emergency Regulations Guide.

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INTRABASIN COORDINATION REQ.'S (3)

- Coordination agreements must outline how the GSAs used the same data and methodologies to prepare the GSP, including: ⁽¹⁾
 - Groundwater elevation data
 - Basin-wide water budget and Sustainable Yield estimate
 - Definition of Undesirable Results
 - Basin-wide Data Management System (DMS)



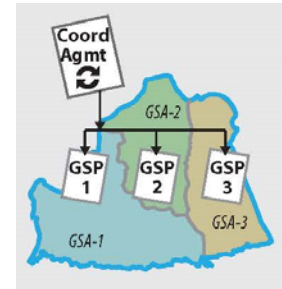
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(1) GSP Regulations §357.4
Figure source: DWR, 2016. GSP Emergency Regulations Guide.

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INTRABASIN COORDINATION CAN CREATE ADDITIONAL EFFICIENCIES

- GSAs may further benefit through coordination on:
 - Implementing a stakeholder engagement plan
 - Developing sustainable management criteria
 - Developing & managing monitoring networks
 - Developing projects and management actions
 - Developing a GSP implementation plan
 - Pursuing funding opportunities for GSP implementation



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DWR EVALUATION OF GSPs (1)

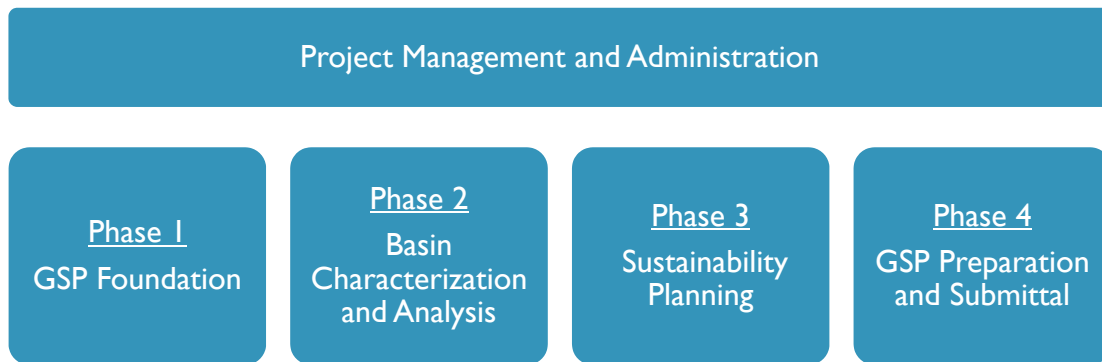
“The Department shall evaluate a Plan...to determine whether the Plan, ***either individually or in coordination with other Plans...would not materially affect the ability of the Agency to achieve the sustainability goal for the basin.***”

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(1) GSP Regulations §355.4

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PROP 1 - GSP DEVELOPMENT "PHASES"



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THE PROP 1 GRANT APPLICATION WORK PLAN WAS WRITTEN FOR A SINGLE GSP⁽¹⁾

"The Work Plan and accompanying schedule and budget were developed based on preparation of a single coordinated GSP for the entire Basin. While not currently anticipated, if one or more of the Basin GSAs ultimately chooses to prepare and adopt a separate, coordinated GSP (pursuant to California Water Code [CWC] §10727(b)(3)), many of the data collection, development, and synthesis efforts and other stakeholder outreach and intra- and interbasin coordination efforts described in this Work Plan will be transferable and utilized by Basin GSAs even if any desire to prepare and adopt separate, coordinated GSPs. Similarly, all Basin GSAs would still coordinate in the development of all Basin-wide GSP components outlined as requirements of a GSP Coordination Agreement (California Code of Regulations, Title 23 [23-CCR] §354.7). The added or incremental costs associated with developing a separate GSP(s) and, in some cases, special management areas within a single GSP proposed by individual GSAs, would be paid for separately by the GSAs proposing such efforts and would not be paid for out of grant funds and are therefore not included in the accompanying budget of this Work Plan."



⁽¹⁾ Footnote 2 of the Prop 1 Application (page 2)

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THE PROP 1 GRANT APPLICATION WORK PLAN WAS WRITTEN FOR A SINGLE GSP⁽²⁾

“Based on the understanding of the Basin gained through stakeholder engagement efforts and technical analyses completed in Phases 1 and 2, the Working Group will consider whether defining separate management areas within the Basin will facilitate implementation of the GSP and provide an increased ability to achieve Basin-wide sustainable groundwater management. Based on initial GSA and stakeholder input from the Working Group and TAC meetings held to date, and considering the significant spatial complexities in hydrogeology and groundwater conditions within the Basin, it is possible that Basin GSAs will want to consider the use and efficacy of management areas in the GSP.⁴

⁴A possible alternative to a distinct management area within a GSP could be adoption of a coordinated, separate GSP for a particular area of the Basin”

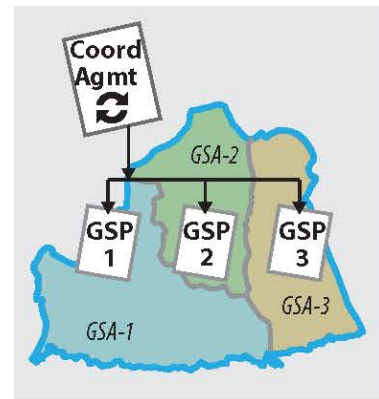


⁽²⁾ Pages 31-32 (and Footnote 4) of the Prop 1 Application

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SCOPING A POTENTIAL 2ND GSP

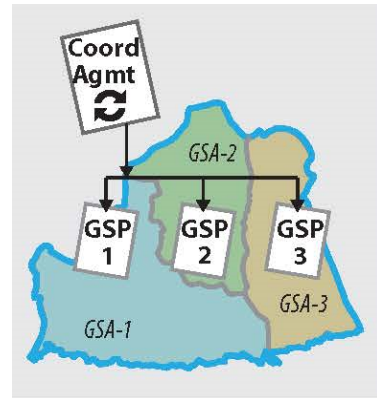
- Estimated the qualitative, incremental cost impacts for preparing a “second GSP” for the Cosumnes Basin on:
 - The “coordinated” GSAs within the Working Group (i.e., the “Basin-GSP”)
 - The “singular” GSA (i.e., preparing an “individual GSP” for its jurisdictional area)



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KEY ASSUMPTIONS

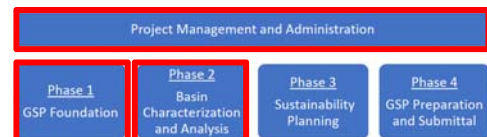
- Prop I grant monies would be administered according to the approved Work Plan included in the original grant application
- The “singular” GSA and “coordinated” GSAs would develop a formal Coordination Agreement that would fully meet the requirements of SGMA for the Basin (see GSP Regulations §357.4)
- The “singular” GSA would fully participate in the Basin-wide GSP development process through Phase 2 (i.e., the “Basin Setting”)



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COST IMPACTS OF A 2ND GSP BY PHASE

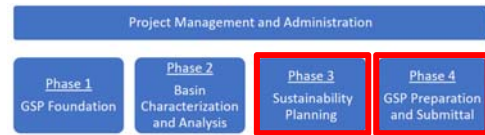


- Project Management & Grant Administration**
 - Increased project management and grant administration costs associated with developing a Coordination Agreement will be incurred by both the “coordinated” and “singular” GSAs
 - Any project management-associated costs with developing a 2nd GSP will be borne by the “singular” GSA
- Phase I – GSP Foundation**
 - Costs to the “coordinated” GSAs will likely remain similar, apart from any increase in intrabasin coordination costs associated with developing a regular “coordination meeting” between the 2 GSP groups
 - The “singular” GSA will be responsible for submitting its own Initial Notification, creating its own funding plan for GSP development, and would likely incur additional costs associated with intrabasin coordination efforts
- Phase 2 – Basin Characterization and Analysis**
 - Assuming the “singular” GSA continues to participate in the Basin-wide development of “Basin Setting” GSP components, costs would largely remain the same for both GSP parties apart from any increased efforts to reconcile discrepancies in Basin setting interpretation and preliminary monitoring network development

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COST IMPACTS OF A 2ND GSP BY PHASE



Phase 3 – Sustainability Planning

- Definition of the *sustainability goal* and *undesirable results* will need to be developed on a Basin-wide scale and articulated in a formal Coordination Agreement between GSP parties⁽¹⁾
- The “singular” GSA will be responsible for developing Sustainable Management Criteria (SMCs), Projects and Management Actions (P/MAs), and finalizing a SGMA Monitoring Network within its jurisdictional area
- The “coordinated” GSAs will likely continue to assess SMCs on a Basin-wide scale, but will focus on developing P/MAs and finalizing the SGMA Monitoring Network within its jurisdictional area

Phase 4 – GSP Preparation and Submittal

- The costs of preparing a 2nd GSP will be fully incurred by the “singular” GSA, whereas the level of effort to develop the “coordinated” GSP is anticipated to remain largely consistent with the Prop I scope
- Formal coordination between GSP parties will be required to ensure the GSPs, when implemented together, fully meet SGMA requirements for the Basin
- GSP submission will need to be coordinated between GSP parties⁽¹⁾



(1) GSP Regulations §357.4

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TOTAL ESTIMATED COST IMPACTS OF A 2ND GSP



Total Estimated Change in Project Costs:

- For the “coordinated” GSAs : **-\$50,000** to **+\$100,000**
- For the “singular” GSA : **+\$200,000** to **+\$400,000**
- Costs could be significantly greater if process does not go smoothly or if additional efforts are duplicated



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QUESTIONS?

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